

DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
Michael J. Sage
Brian E. Greer
Nicole B. Herther-Spiro

*Attorneys for Lehman ALI Inc.
and SASCO 2008-C2, LLC*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
INNKEEPERS USA TRUST, <i>et al.</i>	:	Case No. 10-13800 (SCC)
	:	
Debtors.	:	Jointly Administered
	:	

**RESERVATION OF RIGHTS OF LEHMAN ALI INC. AND SASCO 2008-C2, LLC TO
THE DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) EXTENDING THE
EXCLUSIVE PERIODS DURING WHICH ONLY THE DEBTORS MAY FILE A
CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF, AND (II)
APPROVING MODIFICATION TO THE FIXED/FLOATING PLAN AND REMAINING
DEBTOR PLAN AND AMENDMENTS TO THE CONFIRMATION ORDER**

Lehman ALI Inc. ("Lehman ALI") and SASCO 2008-C2, LLC ("SASCO," together with
Lehman ALI, "Lehman")¹ submit this reservation of rights with respect to the *Debtors' Motion
for Entry of an Order (I) Extending the Exclusive Periods During Which Only the Debtors May
File a Chapter 11 Plan and Solicit Acceptances Thereof, and (II) Approving Modification to the
Fixed/Floating Plan and Remaining Debtor Plan and Amendments to the Confirmation Order*
[Dkt. No. 2051] (the "Motion"), and respectfully state as follows:

¹ The loan agreements and related agreements giving rise to Lehman's claims against certain of the
debtors and debtors in possession in the above-captioned cases are described in prior pleadings filed
by Lehman.

Lehman has been working with the Debtors to resolve its objections to Motion and the relief requested therein. While Lehman is hopeful that resolution can be reached prior to the hearing, no agreement has yet been reached.² Accordingly, Lehman hereby reserves all rights with respect to the Motion including its rights to file a written objection or raise any other objection prior to or at the hearing on the Motion.

Dated: New York, New York
September 12, 2011

Respectfully Submitted,

DECHERT LLP

By: /s/ Brian E. Greer

Michael J. Sage
Brian E. Greer
Nicole B. Herther-Spiro
1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
michael.sage@dechert.com
brian.greer@dechert.com
nicole.hertherspiro@dechert.com

*Attorneys for Lehman ALI Inc.
and SASCO 2008-C2, LLC*

² The Debtors previously extended Lehman's objection deadline to Monday, September 12, 2011.